

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

TEXAS SALVAGE SALES, INC. D/B/A
MERCHANDISE RECYCLERS
LIQUIDATORS
Plaintiff,

v.

THE TRAVELERS LLOYDS
INSURANCE COMPANY
Defendants.

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Civil Action No. 2:15-cv-00169-J

AMENDED JOINT NOTICE OF SETTLEMENT

TO THE HONORABLE JUDGE:

NOW INTO COURT, through the undersigned counsel, come The Travelers Lloyds Insurance Company (“Travelers”) and Texas Salvage Sales, Inc. d/b/a Merchandise Recyclers Liquidators (“Merchandise Recyclers”) and file this Amended Joint Notice of Settlement.

1. Travelers and Merchandise Recyclers have reached a settlement of all claims and controversies in this case.
2. Travelers and Merchandise Recyclers are finalizing the settlement documents, and anticipate that an Agreed Order of Dismissal will be filed within twenty days of this Notice, by October 29, 2015.

(signatures on following page)

Respectfully submitted,

<u>/s/ Martin R. Sadler</u> Martin R. Sadler, Attorney-in-Charge Texas Bar No.: 00788842 msadler@lawla.com LUGENBUHL, WHEATON, PECK, RANKIN & HUBBARD, A LAW CORPORATION 815 Walker Street, Suite 1447 Houston, Texas 77002 Telephone: (713) 222-1990 Facsimile: (713) 222-1996 ATTORNEY-IN-CHARGE FOR DEFENDANT THE TRAVELERS LLOYDS INSURANCE COMPANY	<u>/s/ J. Daren Brown</u> J. Daren Brown, Attorney-in-Charge Texas Bar No.: 24036272 dbrown@sjblawfirm.com STOCKARD, JOHNSTON & BROWN, PC 1800 S. Washington, Suite 115 Amarillo, Texas 79102 Telephone: (806) 372-2202 Facsimile: (806) 379-7799 ATTORNEY-IN-CHARGE FOR PLAINTIFF TEXAS SALVAGE SALES, INC. D/B/A MERCHANDISE RECYCLERS LIQUIDATORS
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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above pleading has been forwarded by Electronic service or certified mail on this the 9th day of October, 2015 to:

J. Daren Brown
STOCKARD, JOHNSTON & BROWN, PC
1800 S. Washington, Suite 115
Amarillo, Texas 79102

/s/ Martin Sadler
Martin R. Sadler